This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

2/15/2005



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Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely:

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 047 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Small Fuel Tank North of the Idaho Nuclear Technology Engineering

Center (INTEC)

Site ID:

047

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

Site 047 is a small (30- to 40- gallon) empty fuel tank located north of INTEC where the Big Lost River intersects with the railroad tracks. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are

The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Site investigations revealed that Site 047 contains a small fuel tank with gauge and hose, abandoned in place in a large open area. The tank appears to be very old, is approximately 30 to 40 gallons, and contains no residual material. There is no visual evidence of stained or discolored soil, loss of vegetation, or odors indicating that fuel was spilled or disposed of in the area. INEEL Cultural Resource personnel estimate that the fuel tank was likely associated with a former agricultural or livestock operation and abandoned several decades ago, prior to the establishment of the Nuclear Reactor Testing Station (NRTS) in 1949.

There is no visual evidence of hazardous constituents or evidence that waste has recently been disposed of at this site. The ground surface shows well-established native grasses and sagebrush. The description of the site condition is based on recent site investigations and INEEL Cultural Resource research; no field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists and no empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with Cultural Resource personnel, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 047 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations and visual observations of the tank and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge of the area, and photographs suggest that any potential risk to receptors would be within acceptable limits. According to Risk-Based Corrective Action (RBCA) guidance, a Tier 0, Class 4 site is a simple historical release site, described by, "No demonstrable threat to human health and safety or sensitive environmental receptors." Site 047 qualifies as a Tier 0, Class 4 because 1) the initial environmental impacts were limited due to the small extent and size of any potential release (30 to 40 gallon), the remote location, and the general lack of receptors; and 2) there are currently no visible stains or odors that would indicate fuel spillage. There is a high degree of certainty that little or no risk to current or potential future receptors exists at this site. According to RBCA, no further action is needed and no tiered evaluation is required.

Signatures! wender Lolley	# Pages: 16 Date: 8/16/01
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:
Approved By: Miles 1 Total 9-30-04	Independent Review: South Leng 4-28-04

DECISION S	TATEMENT
(DOE	RPM)

Date Received: //4/05

Disposition:

The tank at site 047 near the Big Lost
River will be picked and scrapped No CERLA
action will be taken. This determination
of no action will be recorded in the site
database and listed in the 2005 INEEL
Entegrated 5-Year.

Date: 1/14/05 # Pages:

Name: Kathleen Hein Signature: Yallen E Hain

Name: Dennis Faul

DECISION STATEMENT (EPA RPM) SITE-047
Date Received:
Disposition:
EPA concurs that this site be
classified as no action.
Date: 9-23-04 / # Pages:

Signature:

DECISION STATEMENT (IDEQ RPM)		
Date Received:		
Disposition:		
Site 047		
Site 047 is a 30 to 40 gallon empty fuel tank located north of INTEC where the railroad intersects the Big Lost River. The tank appears to be very old and does not contain any residual fluid. There is no evidence of hazardous constituents or other waste at the site. Vegetation is well established.		
The State recommends this site for No Further Action.		
Date: 15/35+ 10, 2004 # Pages:		

PROCESS/WASTE WORKSHEET	/ORKSHEET	
SITE ID: 047	PROCESS:	Small Fuel Tank Located North of INTEC
	WASTE:	Abandoned Agricultural/Livestock-Related Fuel Tank
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Small fuel tank abandoned in place.	Likely resulted from a former agricultural or livestock- related operation.	Artifact: Small Fuel Tank
		Location: The site is located ~1 mile north of INTEC where the Big Lost River intersects with the railroad tracks.
		Description: The site consists of one small (30- to 40-gallon) fuel tank with a gauge and
		HOSE. Laik Collains no lesiqual material.

CONTAMINANT WORKSHEET					
SITE ID: 047	PROCESS:	Small Fuel Tank North of INTEC	of INTEC		
	WASTE:	Abandoned Agricultural/Livestock-Related Fuel Tank	//Livestock-Related F	-uel Tank	
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/	Col 9 Overall Reliability (high/med/ low)
None	Soil	None	Not Applicable	Low	High
					,
				·	

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?
Block 1	Answer:
attached hose place prior to agricultural or	ears to be a small (30- to 40-) gallon, empty fuel tank that includes a gauge and an e. It has been estimated to be more than fifty years old and was likely abandoned in the establishment of the NRTS in 1949. The fuel tank was likely used by a former livestock-related operation. The site is located approximately 1 mile north of INTEC, Lost River intersects with the railroad tracks.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
and Health (E	th INEEL Cultural Resources and Environmental Restoration Environmental Safety ER ES&H) personnel revealed that the Site 047 consists of a small, empty fuel tank to agricultural or livestock activities.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
Interviews were conducted by ER ES&H personnel during a 1994 environmental assessment. Interviews with INEEL Cultural Resource personnel confirm that the fuel tank is agricultural in nature, likely predates INEEL activities, is unrelated to INEEL operations, and poses no potential threat to human health or the environment.	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
Anecdotal Historical Pr Current Proc Photographs Engineering	Cess Data QA Data S

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?	
Block 1	Answer:	
agricultural or site is located	ists of a small (30- to 40-gallon) fuel tank, likely resulting from a former livestock or peration on what is now the INEEL. The fuel tank contains no residual material. The within the boundaries of the INEEL approximately 1 mile north of INTEC, where the intersects with the railroad track.	
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
	al Resource personnel confirm that the fuel tank is old (fifty years), likely related to tural or livestock activities, and poses no potential threat to human health or the	
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)	
Interviews and site investigations confirm the information above; photographs confirm the type and size of tank and the condition of the site.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data Disposal Data Ess Data Disposal Data DA Data DA Data DAD Report DAD Report Urrence Repor	

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.	
	describe the evidence.	
Block 1	Answer:	
constituents, (30- to 40-gal place more th were found in	vidence that a source exists at Site 047. There is no evidence of hazardous disturbed vegetation, stained or discolored soil, or odors. The site consists of a small lon) empty, fuel tank with gauge and attached hose. The tank was likely abandoned in lan fifty years ago and was related to agricultural or livestock activities. No residuals the fuel tank and there is no evidence of release. The tank is considered to be old, and unrelated to INEEL operations.	
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
Site investigations and interviews revealed that the small fuel tank likely resulted from early agricultural or livestock activities, is unrelated to INEEL operations, and poses no potential threat to human health or the environment.		
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)	
This informat photographs.	ion was confirmed with interviews, site investigations, historical research and	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
Anecdotal Historical Procurrent Procurrent Procurrent Photograph Engineering	Cess Data QA Data S Safety Analysis Report Site Drawings D&D Report Currence Report Initial Assessment Well Data	

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?	
Block 1	Answer:	
There is no visual evidence of migration at Site 047. Site investigations reveal no visual evidence of hazardous constituents, disturbed, stained or discolored soil areas, or odors. It was determined that the fuel tank was likely left in place more than fifty years ago, and was related to a former agricultural or livestock operation. There are no residuals inside the fuel tank and there is no evidence of release of fuel around the tank. Vegetation surrounding the fuel tank appears to be well established.		
Block 2	How reliable are the information sources? ☑ High ☑ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
Site inspections and photographs of the tank and surrounding area show no evidence of soil s staining and that vegetation is well established; therefore giving no indication of disturbance, release or the presence of contaminants.		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through site inspections and interviews. Photographs taken of the site show well-established vegetation around the tank.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data Disposal Data	

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?	
Block 1	Answer:	
There is no expected pattern of potential contamination because there is no visual evidence of hazardous substances at the site. There is no evidence of stained or discolored soil, odors or evidence of disturbed vegetation. The fuel tank was determined to be agricultural in nature and unrelated to INEEL operations. The pattern of other hazardous constituents (organics, metals, radionuclides, etc.) cannot be estimated without further field screening or soil sampling beneath and around the fuel tank; however, site investigations confirmed that there was no evidence of release. Because of the age and weathered condition of the debris, it is highly unlikely that any contaminants would be present at levels above risk-based limits.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
This information was obtained from a 1994 environmental baseline assessment, and from subsequent site investigations conducted by INEEL WAG 10 and Cultural Resource personnel. The investigations reveal that the debris is agricultural in nature and predates INEEL activities. Photographs indicate that the soil is not stained or discolored and vegetation near the debris is well established.		
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)	
Site investiga the site.	tions, interviews and photographs confirm the type of debris and present condition of	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5 Documentation about Data ocess Data Disposal Data ess Data QA Data S Safety Analysis Report Surrence Report D&D Report currence Report Disposal Data Multiple Data Description Description D&D Report Description	

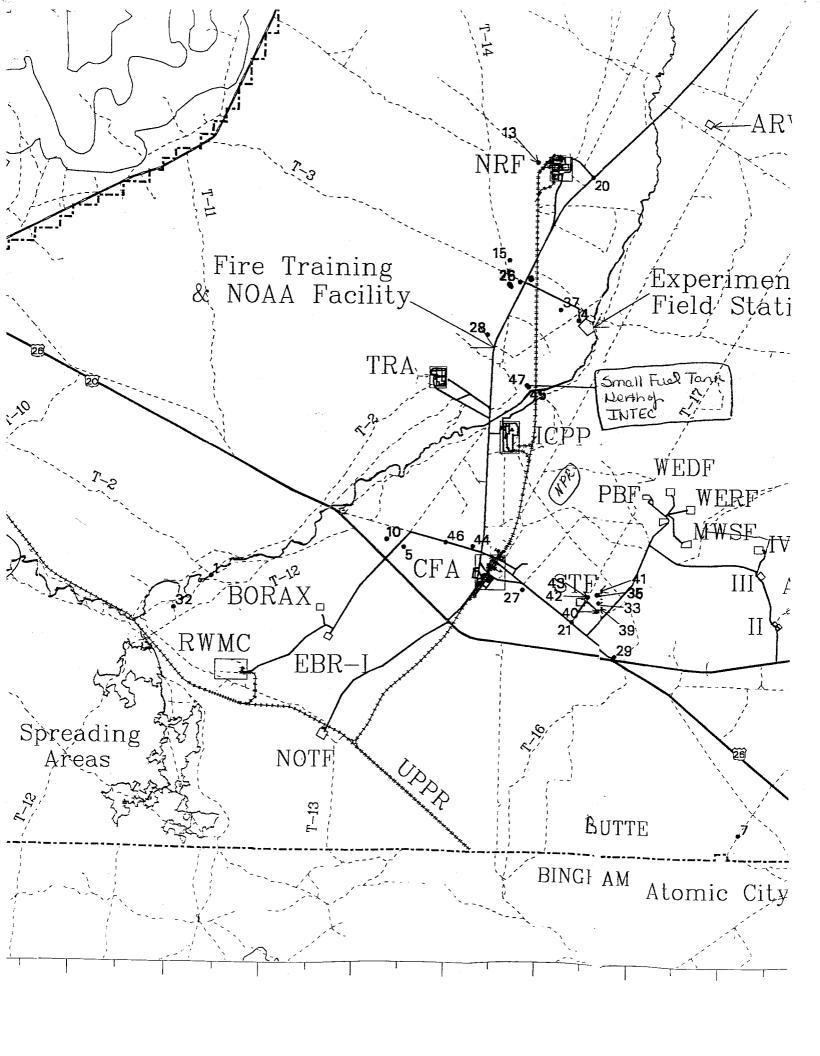
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.	
Block 1	Answer:	
gauge and at release arour estimate beca	tions confirm that Site 047 contains a small, empty fuel tank, ~30 to 40 gallons, with a tached hose. The fuel tank contains no residual materials and there is no evidence of a the tank. There is no evidence of a source at this site or contaminated region to ause there is no evidence of hazardous or radioactive materials. Cultural Resources imate the tank to be more than fifty years old and unrelated to INEEL operations.	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
This information was obtained from an environmental baseline assessment, and a subsequent site investigation. Neither gave any indication that the tank was a potential source of contamination. Photographs of the area show no evidence of release from the fuel tank, and that the vegetation is well established.		
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through site inspections, interviews, photographs and historical research.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
Anecdotal Historical Procurrent Procurrent Procurrent Photographs Engineering	Cess Data QA Data S	

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.
Block 1	Answer:
there is no ev empty, 30- to Cultural Reso operations. T	d quantity of hazardous substances/constituents at this site is near zero, because idence of any hazardous or radioactive materials present. The site consists of an 40-gallon fuel tank, likely related to former agricultural or livestock activities. INEEL purces estimates the tank to be more than 50 years old and unrelated to INEEL he area shows no evidence of release from the fuel tank; the ground surface has no oldration and the surrounding vegetation appears to be well established.
ż	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
interviews an	ion was obtained from a 1994 environmental baseline assessment, site investigation, d photographs. The site investigations revealed no visual evidence of contamination. of the site show well-established vegetation, giving no indication of disturbance.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
	ion was confirmed through interviews, site investigations, and photographs of the area the vegetation is well established, and there is no visual evidence of release.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
Anecdotal Historical Production P	Cess Data QA Data S

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.
Block 1	Answer:
action at this likely related	vidence that a hazardous substance or constituent is present at levels that require site. Interviews and site investigations confirm that the abandoned fuel tank is empty, to former agricultural or livestock operations on what is now the INEEL. The tank is see more than 50 years old and unrelated to INEEL operations.
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Block 2	How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)
	Explain the road and a second and the contract of the contract
This evaluation evidence of s	on is based on interviews, site visitations and photographs of the site. There is no soil staining around the fuel tank, and the vegetation appears to be well established.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
This informat	ion was confirmed through site inspections, historical research, interviews and
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
Anecdotal Historical Pro- Current Pro- Photograph Engineering	cess Data QA Data S Safety Analysis Report Site Drawings D&D Report Currence Report Initial Assessment Summerts Well Data

REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photographs of Site 047: 99-465-1-0, 99-465-1-1.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.

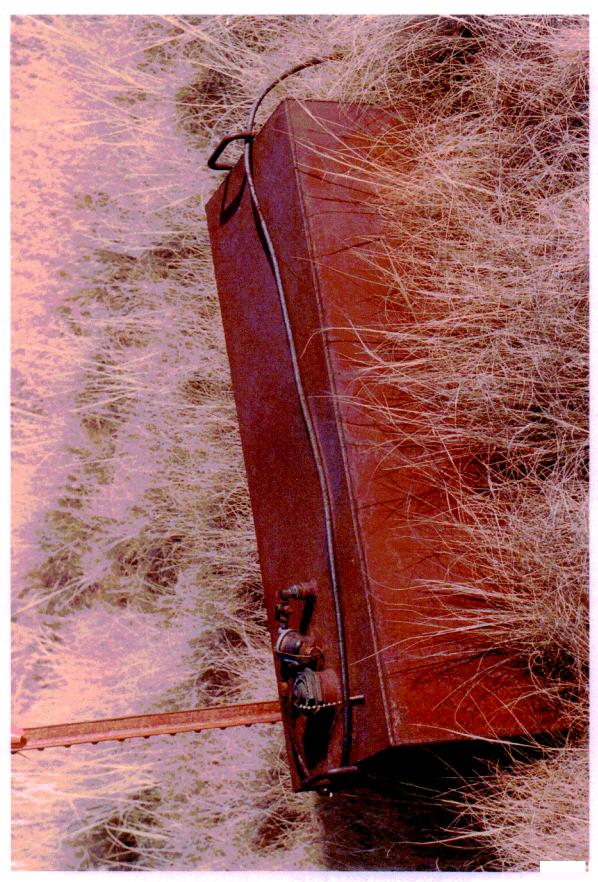


Attachment A

Photographs of Site #047



Site: 047 Small Fuel Tank North of INTEC (99-465-1-0)



Site: 047 Small Fuel Tank North of INTEC (99-465-1-1)

DRAFT

Attachment B

Supporting Information for Site #047

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Par	rt A – To Be Completed By Observer	
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324
2.	Site Title: 047, Small Fuel Tank North of INTEC	
3.	Describe the conditions that indicate a possible inactive or unreported we condition, amount or extent of condition and date observed. A location is survey points or global positioning system descriptors shall be included names or location descriptors for the waste site.	nap and/or diagram identifying the site against controlled
	There is a small tank located north of INTEC where the Big Lost River in visit, one small fuel tank with a gauge and hose was observed. The tank coordinates of the site are summary map as provided.	tersects with the railroad tracks. During the July 1999 site is about 30-40 gallons and is currently empty. The GPS number for this site is 047 and can be found on the
Par	rt B – To Be Completed By Contractor WAG Manager	
4.	Recommendation:	
	This site meets the requirements for an inactive waste site, requires FFA/CO Action Plan. Proposed Operable Unit assignment is recom WAG:	investigation, and should be included in the INEEL invented to be included in the FFA/CO. erable Unit:
	This site DOES NOT meet the requirements for an inactive waste sincluded in the INEEL FFA/CO Action Plan.	te, DOES NOT require investigation and SHOULD NOT be
5.	Basis for the recommendation:	
	The conditions that exist at this site indicate the potential for an inactive or Disturbance of Suspected Inactive Waste Sites.	waste site according to Section 2 of MCP-3448 Reporting
	The basis for recommendation must include: (1) source description; (2) concern; and (4) descriptions of interfaces with other programs, as appli	
6.	Contractor WAG Manager Certification: I have examined the proposed believe the information to be true, accurate, and complete. My recomme	site and the information submitted in this document and endation is indicated in Section 4 above.
Naı	me: Signature:	Date:



PROJECT DOCUMENT REVIEW RECORD

DOCUME	DOCUMENT TITLE/DESCRIPTION:	CRIPTION:	Site 047 Track 1 Decision Documentation Package, OU 10-08: Small Fuel Tank North of INTEC (DOE/ID	nall Fuel Tank North of INTEC (DOE/ID
			10944)	
DATE:	April 3, 2002	REV	REVIEWER: IDEO	
ITEM	SECTION	PAGE	LNEWIND	RESOLUTION
COMMENTS	NTS			
		Page 1	The first sentence refers to the site being north of INTEC and the second sentence states the site is northeast of INTEC. It would be	Comment incorporated. However, the term "northeast" in the title was fixed by the new
			creater to use one direction. Frease clainy.	of the former EOCR and east of CFA.
2		Pages 1 8 0	Two dimensions are presented for this tank (3 ft by 1 ft) and the	Comment incorporated. We agree that the
ì		10, 14, and	volume is estimated to be 30 to 40 gallons. The pictures suggest that the width is about the same as the depth of the tank (1 ft). Those	width and the height appear similar. However, the initial site visit only provided us with the
		last	dimensions result in an estimated volume of slightly over 20 gallons.	estimated volume (30 to 40 gallons) and failed
			If the third dimension was measured, please provide that	to provide measurements to back up the
			measurement and provide a calculated volume. If there is additional	estimate. The length and height measurements
			information available to support the estimated volume, please	were estimated by the original Track I author
			provide that information.	based on the photographs. Instead of second-
				guessing the 30 to 40 gallon estimate made by
	-			the person who actually visited the site, we will
				remove the lengths that were estimated from
				photographs.